CKR LAW LLP

1330 Avenue of the Americas, 14th Floor

New York, New York 10019 Telephone: (212) 259-7300 Facsimile: (212) 259-8200 Gilbert R. Saydah Jr., Esq. gsaydah@ckrlaw.com

and

SSL LAW FIRM LLP

575 Market Street, Suite 2700 San Francisco, California 94105 Telephone: (415) 814-6400

Facsimile: (415) 814-6401 Ivo Keller, Esq. ivo@ssllawfirm.com

Counsel to RREEF America REIT II Portfolio L.P.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

	X	
In re:	:	Chapter 11
SEARS HOLDINGS CORPORATION,	: :	Case No. 18-23538 (RDD)
et al., Debtors.	: (Joint	(Jointly Administered)
Desions.	:	Re: Docket Items 3330 and 333
	:	
	X	

OBJECTION TO CURE AMOUNT FOR STORE # 87099/8709 IN KENT, WASHINGTON, BY RREEF AMERICA REIT II PORTFOLIO L.P.

RREEF America REIT II Portfolio L.P. (the "<u>Landlord</u>") hereby files this objection (the "<u>Objection</u>") to the following notices (collectively referred to herein as the "<u>Cure Notices</u>"): the Seventh Supplemental Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases In Connection With Global Sale Transaction, Doc. No. 3330, filed by the above-captioned Debtors (the "Debtors"); and the Amended Notice of

Assumption and Assignment of Additional Designatable Leases, Doc. No. 3331, filed by Transform Holdco LLC (the "<u>Assignee</u>"). In support of this Objection, Landlord respectfully states:

BACKGROUND FACTS

- 1. On October 15, 2018, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code ("Bankruptcy Code").
- 2. The Debtors lease commercial space (the "<u>Premises</u>") from the Landlord pursuant to an unexpired lease of nonresidential real property (the "<u>Lease</u>"), in Building E of Kent East Corporate Park, having an address of 21612 88th Avenue South, Kent, Washington.
- 3. Pursuant to the Cure Notices, the Debtors seek to assume and assign the Lease to Assignee as part of the Debtors' sale of assets to the Assignee, and the Assignee designated the Lease for assumption and assignment.
- 4. However, both Cure Notices erroneously state that the cure amount for the assumption and assignment of the Lease is \$0. To the contrary, as of April 30, 2019, there was a balance of \$10,263 outstanding under the Lease, stemming from a real estate tax payment in February 2018 for which the Lease requires the Debtors to reimburse the Landlord. The Landlord has also incurred approximately \$6,970 in legal expenses in its attempt to recover the outstanding balance in this bankruptcy case, which must also be paid under the Lease. Further, additional payments of \$65,506 for base rent and other charges are due under the Lease as of May 1, 2019. The cure amount must be modified to reflect these outstanding amounts, and the Debtors or Assignee must either pay the amounts or provide adequate assurance that they will promptly be paid, before the Lease can be assumed and assigned.

CURE OBJECTION

5. Section 365 of the Bankruptcy Code obligates the Debtors to promptly cure all existing defaults before assuming any unexpired lease of non-residential real property. See 11

U.S.C. § 365(b)(1)(A) and (B); *Agri Star Meat & Poultry, LLC v. Nevel Props. Corp.* (*In re Nevel Props. Corp.*), 765 F.3d 846, 849 (8th Cir. 2014) (stating that a lease cannot be assumed unless all payment defaults are cured). As this Court has previously held,

Where there has been a default, either pre-or post-petition [Citations], the debtor in possession may not assume an unexpired lease unless, at the time of assumption, it cures or provides adequate assurance that it will promptly cure the default, it compensates, or provides adequate assurance that it will promptly compensate the landlord for any actual pecuniary loss resulting from the default and it provides adequate assurance of future performance under the lease. 11 U.S.C. § 365(b)(1).

In re Westview 74th Street Drug Corp., 59 B.R. 747, 754 (Bankr. S.D. N.Y. 1986).

- 6. Here, the correct cure amount for assumption and assignment of the lease as of May 1, 2019 is \$82,739.60. That amount consists of (a) a balance of \$10,263 which remains outstanding from before May 1, 2019, stemming from a real estate tax payment due in February 2018 for which the Debtors have failed to reimburse the Landlord; plus (b) base rent, common area maintenance charges, insurance charges, and tax charges in the total amount of \$65,506 that are due as of May 1, 2019; plus (c) legal expenses incurred by Landlord in an effort to enforce the obligations under the Lease, in the amount of \$6,970. A ledger showing these amounts is attached hereto as Exhibit A and incorporated herein by this reference.
- 7. The Debtors (or their successor) also remain responsible for all other accrued or accruing charges under the Lease, including obligations that have accrued but may not yet have been billed, and must pay such charges when they come due under the Lease. Any final order authorizing assumption and assignment of the Lease should clearly state that the Debtors (or their successor) will assume these obligations and pay them when due, regardless of whether they relate to the period before, or after, the assumption and assignment.
- 8. The Lease also requires the Debtors to indemnify and hold the Landlord harmless with respect to any existing claims which may not become known until after the assumption and assignment of the Lease, examples of which may include claims for personal injuries at the

Premises or damage to the Premises by the Debtors or their agents. Any assumption and assignment of the Lease must include the continuation of all indemnification obligations, regardless of when they arose. In the alternative, the Debtors must prove (by insurance or otherwise) that they can satisfy the indemnification obligations under the Lease for any claims that relate to the period before assumption and assignment of the Lease. Nothing in any assumption and assignment order should preclude the Landlord from pursuing the Debtors, their insurance, or any other party that may be liable under the Lease, and the Landlord requests that any order specifically preserve its right to pursue such rights irrespective of any resolution of cure amounts herein.

9. The correct cure amount set forth above includes compensation for attorneys' fees that Landlord has incurred and continues to incur in connection with its attempt to recover the other amounts outstanding under the Lease. Attorneys' fees and costs incurred in enforcement of the covenants, obligations, and conditions of a lease are proper components of a cure claim, and the Debtors or Assignee must pay these charges as part of the assumption and assignment of the Lease. See 11 U.S.C. § 365(b)(1)(A) and (B); In re Entertainment, Inc., 223 B.R. 141, 152 (Bankr. N.D. III. 1998). The fact that a landlord uses bankruptcy procedures to enforce a lease should not preclude recovery of attorneys' fees and costs for such enforcement activity, particularly where the Bankruptcy Court is the exclusive forum where the landlord can obtain any relief, being foreclosed from state court relief by the automatic stay. Id.; see, also, Urban Retail Properties v. Loews Cineplex Entertainment Corporation, et al., No. 01 Civ. 8946, 2002 WL 5355479, 2002 U.S.Dist. LEXIS 6186, *26 (S.D.N.Y. Apr. 9, 2002) (where lease "provides for recovery of attorneys' fees and interest, their receipt deserves the same priority under Section 365(d)(3) as any of the debtors' other obligations that arise postpetition "); Three Sisters Partners, L.L.C. v. Harden (In re Shangra-La, Incorporated), 167 F.3d 843, 850 (4th Cir. 1999). The Supreme Court has upheld the enforceability of such attorneys' fees clauses, ruling that prepetition attorneys' fee clauses were enforceable with respect to issues peculiar to bankruptcy law. Travelers Casualty & Surety Co. Of America v. Pacific Gas & Electric (2007) 127 S. Ct. 1199,

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- 10. Landlord has incurred attorneys' fees enforcing its rights under the Lease and, pursuant to the Lease, is entitled to recover those attorneys' fees from the Debtors as an obligation under the Lease. Landlord estimates its attorneys' fees and costs through the hearing on assumption and assignment to be approximately \$6,970.
- 11. Landlord can only provide the information presently available regarding amounts owed by the Debtors, while reserving the right to amend this Objection as necessary to include any additional or unknown charges that arise, including but not limited to subsequent rent defaults, attorney fees, costs, and interest. There is no basis to impose upon the Landlord the equivalent of an administrative bar date, limiting its recourse to recovery of charges that may come due under the Lease in the future.

CONCLUSION

12. Accordingly, Landlord respectfully requests that the Court require the Debtors and/or Assignee to pay Landlord a cure in the amount set forth herein in connection with the proposed assumption and assignment of the Lease. Landlord reserves its right to supplement this request if additional unpaid expenses accrue.

Dated: May 1, 2019

New York, New York

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1330 Avenue of the Americas, 14th Floor

New York, New York 10019 Telephone: (212) 259-7300 Facsimile: (212) 259-8200 Gilbert R. Saydah Jr., Esq.

gsaydah@ckrlaw.com

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575 Market Street, Suite 2700 San Francisco, California 94105 Telephone: (415) 814-6400

Facsimile: (415) 814-6401

Ivo Keller, Esq.

ivo@ssllawfirm.com

Counsel to RREEF America REIT II Portfolio L.P.

EXHIBIT A

Lease Ledger

International Lease Ledger

Tenant: t0003151 Date: 05/1/2019

Trans Date	From	То	Description	Net	Payment	Balance
Currency : USD						
4/1/2017	4/1/2017	4/30/2017	eins insurance retail and ind	1,075.00	0.00	32,810.47
4/1/2017	4/1/2017	4/30/2017	eretax real estate tax current year	11,552.00	0.00	44,362.47
4/4/2017			chk# 147272 From rCash. Inv Num/Date: STMNT/2017-04-04 Trans Type: CHK. Property:pca55007 chk# 130895181 From rCash. Inv	0.00	37,460.95	6,901.52
4/14/2017			Num/Date: STMNT/2017-04-14 Trans Type: CHK. Property:pca55007 chk# 130905267 From rCash. Inv	0.00	4,912.84	1,988.68
5/1/2017			Num/Date: STMNT/2017-04-28 Trans Type: CHK. Property:pca55007	0.00	11,552.00	-9,563.32
5/1/2017	5/1/2017	5/31/2017	abasernt base rent	29,885.00	0.00	20,321.68
5/1/2017	5/1/2017	5/31/2017	ecam comm area maint current year	6,580.00	0.00	26,901.68
5/1/2017	5/1/2017	5/31/2017	eins insurance retail and ind	1,075.00	0.00	27,976.68
5/1/2017	5/1/2017	5/31/2017	eretax real estate tax current year	11,552.00	0.00	39,528.68
5/2/2017			chk# 148813 From rCash. Inv Num/Date: STMNT/2017-05-02 Trans Type: CHK. Property:pca55007	0.00	37,460.95	2,067.73
5/24/2017			chk# 149555 05/24/2017-Deposit	0.00	1,793.61	274.12
6/1/2017	6/1/2017	6/30/2017	abasernt base rent	29,885.00	0.00	30,159.12
6/1/2017	6/1/2017	6/30/2017	ecam comm area maint current year	6,580.00	0.00	36,739.12
6/1/2017	6/1/2017	6/30/2017	eins insurance retail and ind	1,075.00	0.00	37,814.12
6/1/2017	6/1/2017	6/30/2017	eretax real estate tax current year	11,552.00	0.00	49,366.12
6/6/2017			chk# 130925490 06/06/2017-Deposit	0.00	11,552.00	37,814.12
6/6/2017			chk# 150343 06/06/2017-Deposit	0.00	37,460.95	353.17
6/8/2017			chk# 150636 06/08/2017-Deposit	0.00	1,984.08	-1,630.91
7/1/2017	7/1/2017	7/31/2017	abasernt base rent	29,885.00	0.00	28,254.09
7/1/2017	7/1/2017	7/31/2017	ecam comm area maint current year	6,580.00	0.00	34,834.09
7/1/2017	7/1/2017	7/31/2017	eins insurance retail and ind	1,075.00	0.00	35,909.09
7/1/2017	7/1/2017	7/31/2017	eretax real estate tax current year	11,552.00	0.00	47,461.09
7/3/2017			chk# 130945286 07/03/2017 Deposit	0.00	11,552.00	35,909.09
7/5/2017			chk# 151696 07/05/2017 Deposit	0.00	36,030.22	-121.13

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7/28/2017			chk# 130968350 07/28/2017-DEPOSIT	0.00	11,552.00	-11,673.13
8/1/2017	8/1/2017	8/31/2017	abasernt base rent	29,885.00	0.00	18,211.87
8/1/2017	8/1/2017	8/31/2017	ecam comm area maint current year	6,580.00	0.00	24,791.87
8/1/2017	8/1/2017	8/31/2017	eins insurance retail and ind	1,075.00	0.00	25,866.87
8/1/2017	8/1/2017	8/31/2017	eretax real estate tax current year	11,552.00	0.00	37,418.87
8/2/2017			chk# 153141 08/02/2017-DEPOSIT	0.00	37,540.00	-121.13
8/30/2017			chk# 130993740 08/30/2017 Deposit	0.00	11,552.00	-11,673.13
9/1/2017			chk# 154756 09/01/2017-Deposit	0.00	37,540.00	-49,213.13
9/1/2017	9/1/2017	9/30/2017	abasernt base rent	29,885.00	0.00	-19,328.13
9/1/2017	9/1/2017	9/30/2017	ecam comm area maint current year	6,580.00	0.00	-12,748.13
9/1/2017	9/1/2017	9/30/2017	eins insurance retail and ind	1,075.00	0.00	-11,673.13
9/1/2017	9/1/2017	9/30/2017	eretax real estate tax current year	11,552.00	0.00	-121.13
9/29/2017			chk# 131016011 09/29/2017-DEPOSIT	0.00	11,552.00	-11,673.13
10/1/2017	10/1/2017	10/31/2017	abasernt base rent	30,632.00	0.00	18,958.87
10/1/2017	10/1/2017	10/31/2017	ecam comm area maint current year	6,580.00	0.00	25,538.87
10/1/2017	10/1/2017	10/31/2017	eins insurance retail and ind	1,075.00	0.00	26,613.87
10/1/2017	10/1/2017	10/31/2017	eretax real estate tax current year	11,552.00	0.00	38,165.87
10/3/2017			chk# 156333 10/03/2017-DEPOSIT	0.00	38,287.00	-121.13
10/31/2017			chk# 131037562 10/31/2017 Deposit	0.00	11,552.00	-11,673.13
11/1/2017	11/1/2017	11/30/2017	abasernt base rent	30,632.00	0.00	18,958.87
11/1/2017	11/1/2017	11/30/2017	ecam comm area maint current year	6,580.00	0.00	25,538.87
11/1/2017	11/1/2017	11/30/2017	eins insurance retail and ind	1,075.00	0.00	26,613.87
11/1/2017	11/1/2017	11/30/2017	eretax real estate tax current year	11,552.00	0.00	38,165.87
11/7/2017			chk# 157973 11/07/2017-Deposit	0.00	38,287.00	-121.13
12/1/2017			chk# 159458 12/01/2017-DEPOSIT	0.00	47,891.00	-48,012.13
12/1/2017	12/1/2017	12/31/2017	abasernt base rent	40,236.00	0.00	-7,776.13
12/1/2017	12/1/2017	12/31/2017	ecam comm area maint current year	6,580.00	0.00	-1,196.13
12/1/2017	12/1/2017	12/31/2017	eins insurance retail and ind	1,075.00	0.00	-121.13
12/1/2017	12/1/2017	12/31/2017	eretax real estate tax current year	11,552.00	0.00	11,430.87
12/6/2017			chk# 131059720 12/06/2017 Deposit	0.00	11,552.00	-121.13
1/1/2018	1/1/2018	1/31/2018	abasernt base rent	40,236.00	0.00	40,114.87

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1/1/2018	1/1/2018	1/31/2018	ecam comm area maint current year	7,161.00	0.00	47,275.87
1/1/2018	1/1/2018	1/31/2018	eins insurance retail and ind	1,074.00	0.00	48,349.87
1/1/2018	1/1/2018	1/31/2018	eretax real estate tax current year	13,356.00	0.00	61,705.87
1/3/2018			chk# 131078291 01/03/2018-DEPOSIT	0.00	-11,552.00	50,153.87
1/8/2018			chk# 161075 01/08/2018 Deposit	0.00	-47,891.00	2,262.87
1/30/2018			chk# 131106283 01/30/2018 Deposit	0.00	-11,552.00	-9,289.13
2/1/2018	2/1/2018	2/28/2018	abasernt base rent	40,236.00	0.00	30,946.87
2/1/2018	2/1/2018	2/28/2018	ecam comm area maint current year	7,161.00	0.00	38,107.87
2/1/2018	2/1/2018	2/28/2018	eins insurance retail and ind	1,074.00	0.00	39,181.87
2/1/2018	2/1/2018	2/28/2018	eretax real estate tax current year	13,356.00	0.00	52,537.87
2/6/2018			chk# 163073 02/06/2018-DEPOSIT	0.00	-1,162.00	51,375.87
2/6/2018			chk# 162681 02/06/2018-DEPOSIT	0.00	-47,891.00	3,484.87
2/6/2018			chk# 131111563 02/06/2018-DEPOSIT	0.00	-3,608.00	-123.13
2/27/2018			chk# 131127822 02/27/2018-DEPOSIT	0.00	-13,356.00	-13,479.13
3/1/2018	3/1/2018	3/31/2018	abasernt base rent	40,236.00	0.00	26,756.87
3/1/2018	3/1/2018	3/31/2018	ecam comm area maint current year	7,161.00	0.00	33,917.87
3/1/2018	3/1/2018	3/31/2018	eins insurance retail and ind	1,074.00	0.00	34,991.87
3/1/2018	3/1/2018	3/31/2018	eretax real estate tax current year	13,356.00	0.00	48,347.87
3/7/2018			chk# 164154 03/07/2018 Deposit	0.00	-48,469.00	-121.13
3/27/2018			chk# 131147976 03/27/2018 Deposit	0.00	-13,356.00	-13,477.13
4/1/2018			pycam 2017 CAM REC	2,947.75	0.00	-10,529.38
4/1/2018			pyins 2017 INS REC	-704.64	0.00	-11,234.02
4/1/2018			pyretax 2017 RET REC	-8,146.52	0.00	-19,380.54
4/1/2018	4/1/2018	4/30/2018	abasernt base rent	40,236.00	0.00	20,855.46
4/1/2018	4/1/2018	4/30/2018	ecam comm area maint current year	7,161.00	0.00	28,016.46
4/1/2018	4/1/2018	4/30/2018	eins insurance retail and ind	1,074.00	0.00	29,090.46
4/1/2018	4/1/2018	4/30/2018	eretax real estate tax current year	13,356.00	0.00	42,446.46
4/3/2018			chk# 165648 04/03/2018-DEPOSIT	0.00	-48,471.00	-6,024.54
4/26/2018			chk# 131166259 04/26/2018 Deposit	0.00	-13,356.00	-19,380.54
5/1/2018	5/1/2018	5/31/2018	abasernt base rent	40,236.00	0.00	20,855.46
5/1/2018	5/1/2018	5/31/2018	ecam comm area maint current year	7,161.00	0.00	28,016.46

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5/1/2018	5/1/2018	5/31/2018	eins insurance retail and ind	1,074.00	0.00	29,090.46
5/1/2018	5/1/2018	5/31/2018	eretax real estate tax current year	13,356.00	0.00	42,446.46
5/4/2018			chk# 167193 05/04/2018 Deposit	0.00	-48,471.00	-6,024.54
5/30/2018			chk# 131185494 05/30/2018 Deposit	0.00	-13,356.00	-19,380.54
6/1/2018	6/1/2018	6/30/2018	abasernt base rent	40,236.00	0.00	20,855.46
6/1/2018	6/1/2018	6/30/2018	ecam comm area maint current year	7,161.00	0.00	28,016.46
6/1/2018	6/1/2018	6/30/2018	eins insurance retail and ind	1,074.00	0.00	29,090.46
6/1/2018	6/1/2018	6/30/2018	eretax real estate tax current year	13,356.00	0.00	42,446.46
6/5/2018			chk# 168784 06/05/2018-DEPOSIT	0.00	-48,471.00	-6,024.54
7/1/2018	7/1/2018	7/31/2018	abasernt base rent	40,236.00	0.00	34,211.46
7/1/2018	7/1/2018	7/31/2018	ecam comm area maint current year	7,161.00	0.00	41,372.46
7/1/2018	7/1/2018	7/31/2018	eins insurance retail and ind	1,074.00	0.00	42,446.46
7/1/2018	7/1/2018	7/31/2018	eretax real estate tax current year	13,356.00	0.00	55,802.46
7/2/2018			chk# 131203668 07/02/18 Deposit	0.00	-13,356.00	42,446.46
7/5/2018			chk# 170271 07/05/18 Deposit	0.00	-48,471.00	-6,024.54
7/27/2018			chk# 131225071 07/27/18 Deposit	0.00	-13,356.00	-19,380.54
8/1/2018	8/1/2018	8/31/2018	abasernt base rent	40,236.00	0.00	20,855.46
8/1/2018	8/1/2018	8/31/2018	ecam comm area maint current year	7,161.00	0.00	28,016.46
8/1/2018	8/1/2018	8/31/2018	eins insurance retail and ind	1,074.00	0.00	29,090.46
8/1/2018	8/1/2018	8/31/2018	eretax real estate tax current year	13,356.00	0.00	42,446.46
8/6/2018			chk# 171825 08/06/2018-DEPOSIT	0.00	-41,322.97	1,123.49
8/28/2018			chk# 131247870 CHK-131247870	0.00	-13,356.00	-12,232.51
9/1/2018	9/1/2018	9/30/2018	abasernt base rent	40,236.00	0.00	28,003.49
9/1/2018	9/1/2018	9/30/2018	ecam comm area maint current year	7,161.00	0.00	35,164.49
9/1/2018	9/1/2018	9/30/2018	eins insurance retail and ind	1,074.00	0.00	36,238.49
9/1/2018	9/1/2018	9/30/2018	eretax real estate tax current year	13,356.00	0.00	49,594.49
9/5/2018			chk# 173200 CHK- 173200	0.00	-48,471.00	1,123.49
10/1/2018	10/1/2018	10/31/2018	abasernt base rent	40,236.00	0.00	41,359.49
10/1/2018	10/1/2018	10/31/2018	ecam comm area maint current year	7,161.00	0.00	48,520.49
10/1/2018	10/1/2018	10/31/2018	eins insurance retail and ind	1,074.00	0.00	49,594.49
10/1/2018	10/1/2018	10/31/2018	eretax real estate tax current year	13,356.00	0.00	62,950.49

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10/4/2018			chk# 131269381 10.04.18 - LOCK BOX	0.00	2,095.42	60,855.07
10/10/2018			chk# 174548 CHK 174548	0.00	-48,471.00	12,384.07
11/1/2018			chk# 140018210 CHK-140018210	0.00	-13,356.00	971.93
11/1/2018	11/1/2018	11/30/2018	abasernt base rent	40,236.00	0.00	39,264.07
11/1/2018	11/1/2018	11/30/2018	ecam comm area maint current year	7,161.00	0.00	46,425.07
11/1/2018	11/1/2018	11/30/2018	eins insurance retail and ind	1,074.00	0.00	47,499.07
11/1/2018	11/1/2018	11/30/2018	eretax real estate tax current year	13,356.00	0.00	60,855.07
11/14/2018			chk# 180552 Check - 180552 Reversed by ctrl# 347997 Correction	0.00	48,471.00	12,384.07
11/14/2018			chk# 180552 :Prog Gen Reverses receipt Ctrl# 347983 Correction	0.00	-48,471.00	60,855.07
11/14/2018			chk# 180552 Check - 180552	0.00	48,471.00	12,384.07
12/1/2018	12/1/2018	12/31/2018	abasernt base rent	42,868.00	0.00	55,252.07
12/1/2018	12/1/2018	12/31/2018	ecam comm area maint current year	7,161.00	0.00	62,413.07
12/1/2018	12/1/2018	12/31/2018	eins insurance retail and ind	1,074.00	0.00	63,487.07
12/1/2018	12/1/2018	12/31/2018	eretax real estate tax current year	13,356.00	0.00	76,843.07
12/5/2018			chk# 140039003 CHK 140039003 Reversed by ctrl# 353314 INCORRECT POSTING	0.00	13,356.00	63,487.07
12/5/2018			chk# 140039003 :Prog Gen Reverses receipt Ctrl# 352014 INCORRECT POSTING	0.00	-13,356.00	76,843.07
12/5/2018			chk# 140039003 CHK 140039003	0.00	13,356.00	63,487.07
12/13/2018			chk# 181536 CHK 181536 Reversed by ctrl# 353978 incorrect posting	0.00	51,103.00	12,384.07
12/13/2018			chk# 181536 :Prog Gen Reverses receipt Ctrl# 353929 incorrect posting	0.00	-51,103.00	63,487.07
12/13/2018			chk# 181536 CHK 181536	0.00	51,103.00	12,384.07
1/1/2019	1/1/2019	1/31/2019	abasernt base rent	42,868.00	0.00	55,252.07
1/1/2019	1/1/2019	1/31/2019	ecam comm area maint current year	7,520.00	0.00	62,772.07
1/1/2019	1/1/2019	1/31/2019	eins insurance retail and ind	1,093.00	0.00	63,865.07
1/1/2019	1/1/2019	1/31/2019	eretax real estate tax current year	14,025.00	0.00	77,890.07
1/3/2019			chk# 140059209 CHK 140059209	0.00	-13,356.00	64,534.07
1/9/2019			chk# 182541 CHK 182541 Reversed by ctrl# 359570 INCORRECT POSTING	0.00	51,103.00	13,431.07
1/9/2019			chk# 182541 :Prog Gen Reverses receipt Ctrl# 359272 INCORRECT POSTING	0.00	-51,103.00	64,534.07
1/9/2019			chk# 182541 CHK 182541	0.00	51,103.00	13,431.07

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1/29/2019			chk# 140077213 chk 140077213	0.00	-13,356.00	75.07
2/1/2019	2/1/2019	2/28/2019	abasernt base rent	42,868.00	0.00	42,943.07
2/1/2019	2/1/2019	2/28/2019	ecam comm area maint current year	7,520.00	0.00	50,463.07
2/1/2019	2/1/2019	2/28/2019	eins insurance retail and ind	1,093.00	0.00	51,556.07
2/1/2019	2/1/2019	2/28/2019	eretax real estate tax current year	14,025.00	0.00	65,581.07
2/6/2019			chk# 183438 Check - 183438	0.00	-51,103.00	14,478.07
2/28/2019			chk# 140092556 CHK 140092556	0.00	13,356.00	1,122.07
3/1/2019	3/1/2019	3/31/2019	abasernt base rent	42,868.00	0.00	43,990.07
3/1/2019	3/1/2019	3/31/2019	ecam comm area maint current year	7,520.00	0.00	51,510.07
3/1/2019	3/1/2019	3/31/2019	eins insurance retail and ind	1,093.00	0.00	52,603.07
3/1/2019	3/1/2019	3/31/2019	eretax real estate tax current year	14,025.00	0.00	66,628.07
3/7/2019			chk# 184212 CHK-184212	0.00	51,103.00	15,525.07
4/1/2019			pycam 2018 CAM REC	225.88	0.00	15,750.95
4/1/2019			pyins 2018 INS REC	-1,160.95	0.00	14,590.00
4/1/2019			pyretax 2018 RET REC	-1,185.40	0.00	13,404.60
4/1/2019	4/1/2019	4/30/2019	abasernt base rent	42,868.00	0.00	56,272.60
4/1/2019	4/1/2019	4/30/2019	ecam comm area maint current year	7,520.00	0.00	63,792.60
4/1/2019	4/1/2019	4/30/2019	eins insurance retail and ind	1,093.00	0.00	64,885.60
4/1/2019	4/1/2019	4/30/2019	eretax real estate tax current year	14,025.00	0.00	78,910.60
4/2/2019			chk# 184633 CHK 184633	0.00	1,134.00	77,776.60
4/9/2019			chk# 185035 CHK 185035	0.00	51,481.00	26,295.60
4/11/2019			chk# 140109376 CHK-140109376	0.00	14,025.00	12,270.60
4/11/2019			chk# 140109375 CHK-140109375	0.00	2,007.00	10,263.60
5/1/2019	5/1/2019	5/31/2019	abasernt base rent	42,868.00	0.00	53,131.60
5/1/2019	5/1/2019	5/31/2019	ecam comm area maint current year	7,520.00	0.00	60,651.60
5/1/2019	5/1/2019	5/31/2019	eins insurance retail and ind	1,093.00	0.00	61,744.60
5/1/2019	5/1/2019	5/31/2019	eretax real estate tax current year	14,025.00	0.00	75,769.60

Subtotal: 75,769.60
Attorneys' Fees Incurred to Enforce

Lease: 6,970

TOTAL: 82,739.60